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July 30, 2012

Nancy Rumrill  
U.S. Environmental Protection Agency, Region 9  
Ground Water Office, WTR-9  
75 Hawthorne Street  
San Francisco, CA 94105

Dear Ms. Rumrill,

I wanted to thank you again for meeting with me and the team from Johnson Utilities regarding Curis's proposed Florence Copper Mine. In my opinion it was a productive meeting to assist in better understanding Curis's proposed operations and USEPA's review of Curis's application.

I am sure you realize that our brief discussion was not exhaustive and that there are numerous other deficiencies in Curis's proposal. There are serious inadequacies in Curis's investigation to date, enormous data gaps that should be filled, major flaws in their proposals for demonstrating hydraulic control and monitoring for contaminants, and serious concerns with their groundwater model, which is the primary tool Curis relies upon to justify this project. Even significant changes to the terms and conditions of the permit proposed by Curis are unlikely to eliminate the risk posed by this project. We continue to believe that Curis's proposal is inappropriate given the surrounding community and downgradient groundwater uses, both current and future. There is simply too much at stake to risk reliance upon Curis's proposed hydraulic control of its acidic injectate. For these reasons, it is our position that USEPA should not waive the requirement that Curis demonstrate hydraulic control, as Curis proposed, and that USEPA should reexamine the appropriateness of the existing aquifer exemption for this project. In short, USEPA should not rely upon BHP's 1990s investigations and existing UIC permit terms as a starting point for Curis's application, but should require a fresh review of the project as if it were a new proposal. We plan to provide additional information in the near future to support our position.

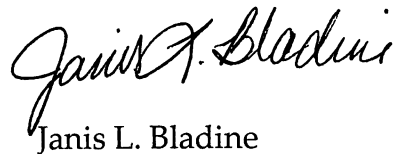
JENNINGS, HAUG  
& CUNNINGHAM, LLP.

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On another note, I understand that your office recently sent a request to Curis for some additional information regarding their proposed project. Please accept this letter as my request pursuant to FOIA for a copy of that correspondence.

Again we appreciate your continued professional cooperation regarding this matter and look forward to discussing this project more with you and other USEPA professionals.

Sincerely,

A handwritten signature in black ink, reading "Janis L. Bladine". The signature is written in a cursive, flowing style.

Janis L. Bladine

Cc: David Albright, USEPA  
Alexa Engelman, Office of Regional Counsel  
Brett Moffatt, Office of Regional Counsel  
Justin Merritt, Southwest Value Partners  
Chris Thomas, Squire Sanders  
Rich Mendolia, Arizona Department of Environmental Quality